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Attorneys for Defendants

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

BREANNA JUNE COHEN,

Plaintiff,

v.

CLAYTON EARL STUBBLEFIELD or the
unknown motor vehicle driver identified and
described herein; and GREENWOOD
MOTOR LINES INC, doing business as
R+L CARRIERS, a foreign business
corporation,

Defendants.

Civil No.:

**NOTICE OF REMOVAL TO
FEDERAL COURT**

DEMAND FOR JURY TRIAL

TO: CLERK OF THE COURT

PLEASE TAKE NOTICE THAT defendants Clayton Earl Stubblefield and

Greenwood Motor Lines Inc., dba R+L Carriers (“Defendants”) hereby remove to this court

Page 1 – NOTICE REMOVAL TO FEDERAL COURT –
DEMAND FOR JURY TRIAL

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the state action described below:

1. On or about June 8, 2020, an action was filed in the Circuit Court of the state of Oregon for the county of Multnomah entitled *Breanna June Cohen v. Clayton Earl Stubblefield or the unknown motor vehicle driver identified and described herein; and Greenwood Motor Lines, Inc., doing business as R+L Carriers*, a foreign business corporation, case number 20CV19971. True and correct copies of the summonses and complaint are attached hereto as **Exhibit 1**.

2. This action is a civil action over which this court has original jurisdiction pursuant to 28 USC §1332, and is one that may be removed to this court by defendants pursuant to 28 USC §1441(b) because:

a. At all relevant times, upon information and belief plaintiff Breanna June Cohen's state of residence is Oregon. The complaint does not allege where she is a resident.

b. At all relevant times, defendant Clayton Earl Stubblefield was and is a resident of the state of Washington.

c. At all relevant times, defendant Greenwood Motor Lines, Inc., doing business as R+L Carriers was and is a business incorporated in the state of South Carolina, and R+L Carriers, Inc. was and is a business incorporated in the state of Ohio. Greenwood Motor Lines, Inc., doing business as R+L Carriers' principal place of business is in Ohio.

d. Plaintiff seeks \$270,000.00 in damages.

3. Removal is timely pursuant to 28 USC §1446(b) because the earliest the summons and complaint were served on Defendants was June 17, 2020.

4. This is the district and division embracing the place where the state court action is pending (Multnomah County Circuit Court).

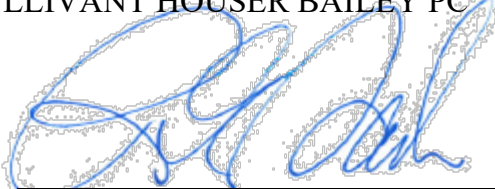
5. No other proceedings have occurred and no other documents have been served in the state court action other than the service of summonses and complaint, as referenced above. A copy of the docket in the state court action is attached as **Exhibit 2**.

6. In filing this notice, defendants do not waive any defenses or claims including, but not limited to, any defenses based on jurisdiction, service or status of limitations.

7. DEMAND FOR JURY TRIAL.

DATED: July 14, 2020

BULLIVANT HOUSER BAILEY PC

By 

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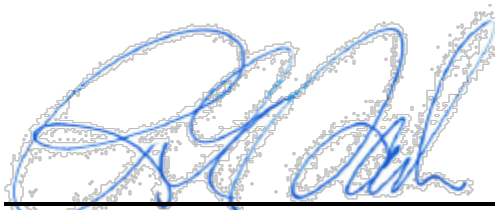
CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of July, 2020, I caused to be served the foregoing Notice of Removal to Federal Court - Demand for Jury on the following party at the following address:

Emily Crocker Stebbins
The Gatti Law Firm
235 Front Street SE #200
Salem, OR 97301
Facsimile: (503) 371-2482
Email: ecrocker@gattilaw.com
Of Attorneys for Plaintiff

by:

<input checked="" type="checkbox"/>	U.S. Postal Service, ordinary first-class mail
<input type="checkbox"/>	U.S. Postal Service, certified or registered mail, return receipt requested
<input type="checkbox"/>	Hand Delivery
<input checked="" type="checkbox"/>	E-Service
<input checked="" type="checkbox"/>	Other (specify) <u>Email</u>



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